

1 SHEILA L. MOHSINI, ESQ (SBN 326635)
2 **MOHSINI LAW**
3 118 E OAK AVE STE B
4 VISALIA, CA 93292
5 PH: (559) 372-7221
6 FAX: (559) 553-8838
7 E-MAIL: SHEILA@MOHSINILAW.COM

8 Attorney for Plaintiff

9 NATALIYA SHTEVNINA, ESQ
10 ALLEGRA ANVARI, ESQ
11 **COUNTY OF PLACER**
12 OFFICE OF COUNTY COUNSEL
13 175 FULWEILER AVE
14 AUBURN, CA 95603
15 PH: (530) 889-4055
16 FAX: (530) 889-4069
17 EMAIL: CCL-ESERVICE@PLACER.CA.GOV
18 NSHTEVNINA@PLACER.CA.GOV
19 AANVARI@PLACER.CA.GOV

20 LEE H. ROISTACHER, ESQ.
21 KIMBERLY A. SULLIVAN, ESQ.
22 **DEAN, GAZZO, ROISTACHER LLP**
23 440 STEVENS AVE STE 100
24 SOLANA BEACH, CA
25 PH: (858) 264-4938
26 FAX: (858) 492-0486
27 EMAIL: LROISTACHER@DEANGAZZO.COM
28 KSULLIVAN@DEANGAZZO.COM
MMACIAS@DEANGAZZO.COM
MKILCREASE@DEANGAZZO.CO

Attorneys for Defendants

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3

4 STACIE MILLER, INDIVIDUALLY AND AS)
5 SUCCESSOR IN INTEREST TO, ESTATE OF)
6 VINTON MILLER)

7 PLAINTIFF,

8 vs.

9 PLACER COUNTY, A MUNICIPAL)
10 CORPORATION; CALIFORNIA HIGHWAY)
11 PATROL OFFICER CLAYTON GUILLEMIN,)
12 INDIVIDUALLY; CALIFORNIA STATE)
13 PARKS OFFICER MATTHEW YARBROUGH,)
14 INDIVIDUALLY; BROOKE RITZMAN,)
15 INDIVIDUALLY, AND DOE 1 TO 100,)
16 INDIVIDUALLY, JOINT, AND SEVERALLY)

17 DEFENDANTS(S)

Case No.: 2:25-cv-01389-WBS-JDP

**STIPULATION AND JOINT REQUEST
FOR ORDER TO CONTINUE
DEFENDANT'S MOTION TO STAY AND
MOTION TO DISMISS; DECLARATION
OF SHEILA L. MOHSINI; ORDER**

Honorable Judge: William B. Shubb

15 Plaintiff STACIE MILLER, and Defendants PLACER COUNTY, and PLACER COUNTY
16 SHERIFF'S OFFICE ("County Defendants"), and CALIFORNIA HIGHWAY PATROL OFFICER
17 CLAYTON GUILLEMIN ("CHP Officer Clayton Guillemine"), by and through their counsel,
18 hereby, stipulate, pursuant to Civil Local Rules

19 WHEREAS, Defendant CHP Officer Clayton Guillemine filed a Motion to Stay Proceedings
20 on September 3, 2025. (ECF Doc. 51)

21 WHEREAS, Plaintiff filed Amended Complaint on September 15, 2025. (ECF Doc. 50)

22 WHEREAS, Defendant CHP Officer Clayton Guillemine filed a Motion to Dismiss on
23 September 24, 2025. (ECF Doc. 61)

24 WHEREAS, Defendants County Defendants filed a a Motion to Dismiss on September 29,
25 2025. (ECF Doc. 64)

26 WHEREAS, the above-mentioned matters are scheduled to be heard on November 24, 2025.
27
28

1 NOW THEREFORE, the parties hereby STIPULATE as follows:

2 No discovery shall be sought from Defendant CHP Officer Clayton Guillemine pending the
3 Court's ruling on Defendant's Motion to Stay Proceedings filed on September 3, 2025.

4 The parties further STIPULATE and JOINTLY REQUEST that the Court continue the
5 Motions to Dismiss and Motion to Stay currently set for November 24, 2025 at 1:30 P.M to January
6 20, 2026 at 1:30 P.M.

7 SHEILA L. MOHSINI
8 MOHSINI LAW

9 DATED: 08/24/25

10 /s/ Sheila L. Mohsini
Attorney for Plaintiff

11
12 DATED: 11/3/2025

NATALIYA SHTEVNINA, ES
13 COUNTY OF PLACER
OFFICE OF COUNTY COUNSEL

14 /s/ Nataliya Shtevnina
Attorney for Defendants
15 COUNTY OF PLACER

16 DATED: 11/7/2025

LEE H. ROISTACHER, ESQ.
17 DEAN, GAZZO, ROISTACHER LLP

18 /s/ Lee H. Roistacher
Attorney for Defendant
19 CLAYTON GUILLEMIN

20
21
22
23
24
25
26
27
28

DECLARATION OF SHEILA L. MOHSINI

I, Sheila L. Mohsini, declare and state as follows:

1. I am attorney at law and counsel of record for Plaintiff STACIE MILLER (“Plaintiff”)
2. I submit this declaration in support of the Stipulation and Joint Request to Continue the Motion to Dismiss and Motion to Stay.
3. On November 24, 2025, counsel for Plaintiff will be on medical leave.
4. The parties therefore propose to move the date for the motions to be heard from November 24, 2025 to January 20, 2026, the proposed date is the next date that counsel for Plaintiff and counsel for Defendants are available for the Court’s availability to hear motions.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: October 30, 2025


/s/ Sheila L. Mohsini
SHEILA L. MOHSINI
Attorney for Plaintiff

ORDER

PURSUANT TO STIPULATION, and good cause appearing, IT IS SO ORDERED that Defendants County Defendants and CHP Officer Clayton Guillemín's Motions to Dismiss and Defendant CHP Officer Clayton Guillemín's Motion to Stay set for November 24, 2025 at 1:30 p.m. shall be continued to **January 20, 2026 at 1:30 p.m.**

The Scheduling Conference is continued from January 26, 2026 to **March 9, 2026 at 1:30 p.m.** A joint status report shall be filed no later than **February 23, 2026** in accordance with the Court's Order Re: Status (Pretrial Scheduling) Conference filed May 16, 2025 (Docket No. 3).

Dated: November 10, 2025



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE